

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

vs.

VINCENT LAMBERT,

Defendant

Cr. No. 23-10140-IT

JOINT STATUS REPORT

On May 23, 2023, a grand jury returned an indictment charging the defendant with three counts of Distribution of Methamphetamine, in violation of 21 U.S.C. § 846. The indictment charges drug quantities that trigger mandatory-minimum sentences under 21 U.S.C. § 841(b).

Defendant was arrested on June 7, 2023, and appeared in Court on that date. At his arraignment on June 12, 2023, defendant consented to voluntary detention and remains detained.

Pursuant to Local Rule 116.5(a), the parties submit the following joint status report.

**1. Automatic Discovery and Discovery Requests**

The government provided initial automatic discovery on July 20, 2023. Prior defense counsel Oscar Cruz, Jr., was recently appointed Interim Defender for the Federal Defender's Office and transferred this matter to Assistant Federal Public Defender Cara McNamara. New defense counsel requires more time to review discovery.

**2. Timing of Additional Discovery**

The government will provide any additional exculpatory information as provided by the Local Rules.

3. **Timing of Additional Discovery Requests**

Defendants reserve the right to make discovery requests upon complete review of discovery produced to-date.

4. **Protective Orders**

No party has filed for a motion for a protective order.

5. **Pretrial Motions**

The defendant has not filed any pretrial motions under Fed. R. Crim. P. 12(b). He reserves the right to file after complete review of discovery.

6. **Timing of Expert Disclosures**

The Court has not yet established a date for expert witness disclosures. The government will provide expert disclosures as required by Rule 16.

7. **Defenses**

The defendant needs additional time to review discovery before deciding whether he intends to raise any affirmative defenses to the present charges.

8. **Excludable Delay**

Zero days of non-excludable time have accrued and 70 days will remain under the Act in which the case must be tried.

9. **Plea Discussions, Trial**

The parties have not engaged in plea negotiations. It is therefore difficult to assess the likelihood of trial. Any trial is anticipated to last 2-3 days.

10. **Timing of Interim Status Conference**

The Court may wish to cancel the conference scheduled for October 4, 2023, as there is no need for the hearing in light of the information set forth in this report. The parties suggest that the

Court set an interim status conference in 30-45 days. The parties jointly request that any Speedy Trial Act time be excluded from October 4, 2023, until any further status conference that the Court schedules.

Respectfully submitted,

JOSHUA S. LEVY  
Acting United States Attorney

By: /s/ Samuel R. Feldman  
Samuel R. Feldman  
Assistant United States Attorney  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants .

/s/ Samuel R. Feldman

Samuel R. Feldman

Assistant United States Attorney

Date: September 27, 2023